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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) Case No. CR 19-392 JSW
14 Plaintiff,)
15 v.) STIPULATION TO CONTINUE STATUS
16 MATTHEW JAMAIL SEWELL,) CONFERENCE AND ~~PROPOSED~~ ORDER
17 Defendant.)
18)

19 **STIPULATION**

20 WHEREAS, on April 30, 2020, the Court issued an Order Regarding Status Set for May 12,
21 2020 and Requiring Joint Status Report ("Order"), which directed the parties to advise the Court
22 whether they intend to continue the matter and, if so, to submit a stipulation and proposed order with a
23 new date and time;

24 WHEREAS, the parties have conferred and believe it would be appropriate to continue the May
25 12, 2020, status conference to June 16, 2020, at 1 p.m.;

26 WHEREAS, the parties agree that the time between May 12, 2020, and June 16, 2020, should be
27 excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B), and that the
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STIPULATION AND ~~PROPOSED~~ ORDER
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ends of justice are served by granting an extension of time and that an exclusion of time outweighs the best interests of the public and the defendant in a speedy trial, *see* 18 U.S.C. § 3161(h)(7)(A);

THEREFORE, the parties stipulate and agree, and respectfully request that the Court order, that the status conference, currently scheduled for May 12, 2020, be continued to June 16, 2020, at 1 p.m. The parties further stipulate and agree, and respectfully request that the Court order, that the time from May 12, 2020, to June 16, 2020, will allow for the effective preparation of counsel, *see* 18 U.S.C. § 3161(h)(7)(B)(iv), and that the ends of justice served by excluding the time from May 12, 2020, to June 16, 2020, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). The parties stipulate and agree the Court shall enter the proposed order below.

IT IS SO STIPULATED.

DATED: May 5, 2020

DAVID L. ANDERSON
United States Attorney

/s/

ROBERT S. LEACH
Assistant United States Attorney

DATED: May 5, 2020

COOPER, COOPER & MORRIS

/s/

COLIN L. COOPER
Attorney for Defendant Matthew Sewell

~~PROPOSED~~ ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court, and for good cause shown, the Court orders that the status conference, currently scheduled for May 12, 2020, be continued to June 16, 2020, at 1 p.m. The Court finds that failing to exclude the time from May 12, 2020, to June 16, 2020, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 12, 2020, to June 16, 2020, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the

1 parties, IT IS HEREBY ORDERED that the time from May 12, 2020, to June 16, 2020, shall be
2 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 IT IS SO ORDERED.

4 DATED: May 5, 2020



THE HONORABLE JEFFREY S. WHITE
United States District Judge